

# Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc.  
Pursuant to The Honorable Judge Victor Marrero of the  
United States District Court, Southern District of New York

322 Eighth Avenue Suite 1704 New York, NY 10001 (212) 523 – 0686 rseiden@seidenlawgroup.com

**VIA ECF**

Hon. Victor Marrero  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

January 9, 2023

Re: *Baliga, et al. v. Link Motion Inc., et al.*, 1:18-cv-11642-VM-VF (S.D.N.Y.)

Dear Judge Marrero,

I write pursuant to the Order Granting Preliminary Injunction and Appoint Temporary Receiver dated February 1, 2019 (the “Order”; ECF 26) to update the Court on material matters concerning Link Motion Inc. (“LKM”).

On January 6, 2023, the Receiver received an email from Maples and Calder Service Europe Limited (“Maples”), LKM’s registered agent in the Cayman Islands, relating to a Maples invoice to LKM in the amount of \$3,219.51 (the “Maples Invoice”).<sup>1</sup> In its email, Maples indicated that if LKM fails to pay the Maples Invoice by January 31, 2023, LKM will no longer be in good standing (stated differently, LKM will be struck off the Cayman Register)<sup>2</sup> under Cayman law.

Given that there are no funds available to the Receivership, the Receiver is unable to pay the Maples Invoice. Further, in light of the Court’s order requiring the Receiver to preserve the “status quo” (ECF 331), my office has not taken any actions in response to the Maples Invoice other than to inform Maples that the Receiver is required to preserve the “status quo” and has no funds in its estate. As such, I will follow the Court’s guidance as to actions that the Receiver should take (if any) in light of the Court’s order and the best interests of LKM.

Please do not hesitate to contact me via email or telephone if your Honor wishes to discuss this matter in further detail.



Robert W. Seiden, Esq.  
Court-Appointed Temporary Receiver  
for Link Motion Inc.

cc: All Parties (via ECF)

<sup>1</sup> The copies of the emails with Maples Invoice are attached as Exhibit A to this letter.

<sup>2</sup> Where the company has been struck off the Cayman Register, the company and the directors, shareholders, liquidators, and receivers thereof may not: (i) commence legal proceedings; (ii) carry on any business or in any way deal with the assets of the company; (iii) defend any legal proceeding; (iv) make any claim or claim any right for, or in the name of the company; or (v) act in any way with respect to the affairs of the company. System Day, Cayman Islands Company Restoration, (Jan. 9, 2023, 9:40 AM), <https://www.systemday.com/cayman-islands-company-restoration/#:~:text=Effect%20of%20a%20company%20being,Defend%20any%20legal%20proceedings>